

brownrudnick

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VIA ELECTRONIC FILING

Honorable Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 By **February 25, 2022**, Defendant shall file a response to Plaintiff's Discovery Dispute Letter at Docket No. 172, and state whether any portion of that letter requires confidential treatment. The conference scheduled for February 23, 2022, is **adjourned** to **March 2, 2022** at **11:00 a.m.** The Clerk of Court is respectfully directed to close the motion at Docket No. 171.

SO ORDERED.

Dated: February 22, 2022 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Kewazinga Corp. v. Google LLC, Case No. 1:20-cv-1106-LGS (S.D.N.Y.)

Request for Permission to Redact Kewazinga's Discovery Dispute Letter

Dear Honorable Judge Schofield:

Plaintiff Kewazinga Corp. ("Kewazinga") respectfully requests permission to file a redacted version of its concurrently filed Discovery Dispute Letter ("Letter"), with an unredacted version to be filed under seal. Kewazinga makes this request pursuant to the Local Rules of the Southern District of New York, The Notice Regarding Privacy and Public Access to Electronic Civil and Criminal Case Files of the Southern District of New York, and Your Honor's Individual Rule I(D)(3). Kewazinga understands that the Letter includes information which Defendant Google, LLC ("Google") has designated as confidential, and that Google may seek to redact. Although Kewazinga cannot demonstrate that the material designated by Google should be kept under seal, Kewazinga does not oppose Google's position as to those designations. As such, Kewazinga anticipates that Google will file a letter in support of this motion to seal.

Specifically, Kewazinga requests an order granting leave to file under seal the portions as listed and identified below:

Portion to Be Filed Under Seal	Designating Party
Highlighted portions in yellow of the Letter at pgs. 2-3.	Google

Respectfully submitted,

/s/ Ian G. DiBernardo

Ian G. DiBernardo

cc: All Counsel (by ECF Filing)